
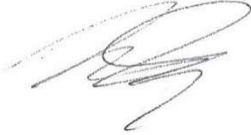


Horsham District Council / West Sussex County Council

Statement of Common Ground

Horsham Local Plan 2023-2040

Signatories:

Barbara Childs, Director of Place Horsham District Council	Mike Elkington, Head of Planning Services West Sussex County Council
	

Dated: 25.07.24

Statement

1. Introduction and Scope

- 1.1 The purpose of this Statement of Common Ground (SoCG) is to document the strategic cross-boundary matters that have been or are being addressed jointly by West Sussex County Council (WSCC) as a provider of infrastructure and Horsham District Council (HDC) as a local planning authority, as necessary to demonstrate effective joint working, or to draw out areas of common ground that are specific or unique to the parties. This SoCG has been produced in preparation for the Regulation 22 submission of the Horsham District Local Plan 2023-2040.
- 1.2 In April 2020, WSCC issued a joint Statement of Common Ground that included all the District and Borough Councils within West Sussex as signatories. The 2020 Statement of Common Ground is still valid, and sets out the process and arrangements for co-operation between WSCC and the local planning authorities in West Sussex in relation to the statutory and non-statutory functions and services WSCC oversees, including Minerals and Waste Planning. The content of this SoCG instead focuses on issues specific to Horsham District and the emerging Horsham District Local Plan. The matters dealt with in this statement are:
- Section 2: Water neutrality
 - Section 3: Local Plan development
 - Section 4: Key strategic cross-boundary matters
 - Section 5: Housing need

Section 6: Education provision

Section 7: Transport mitigation

Section 8: Flood risk management

Section 9: Library requirements

Section 10: Fire and Rescue Service requirements

Section 11: Other Matters

Section 12: Closing Matters and Further Work

- 1.3 This statement has been produced in preparation for submission of the draft Local Plan to the Planning Inspectorate in 2024, following the Regulation 19 publication in early 2024. This statement has been updated throughout the preparation of the Local Plan to reflect the circumstances at the time.

2. Water neutrality

- 2.1 Following receipt of Natural England’s Position Statement regarding the impact of water abstraction on protected wildlife in the Arun Valley, the affected local authorities which includes West Sussex County Council and Horsham District Council, have been undertaking significant joint working to address this key issue.
- 2.2 To ensure that the Horsham District Local Plan does not deliver development which continues to harm the Arun Valley it has been prepared to be “water neutral”. Water neutrality is likely to represent a constraint to development across the District for some time and water infrastructure improvements will be required in the future to overcome this. There has been a significant fall in planning permissions since late 2021, and an ongoing constraint on development coming forward in an HRA-compliant manner is expected. HDC, WSCC and the other affected local authorities will continue to work together with the relevant statutory bodies to address the Arun Valley habitats issue and support water neutrality.

3. Local Plan Development

- 3.1 WSCC is satisfied that Horsham District Council has engaged with them proactively and on an ongoing basis during the preparation of the Horsham District Local Plan with the objective of both parties being to achieve positive outcomes in relation to strategic cross-boundary issues identified and to support sustainable growth.
- 3.2 WSCC did not raise any objections to the content of the Regulation 18 Consultation version Horsham District Local Plan, although did consider that the Plan could not be found sound until the completion of the Horsham Transport Study which was still underway at the time.
- 3.3 The Regulation 19 Local Plan was published in early 2024 and WSCC submitted representations which consisted of holding objections on the basis of soundness relating to highways and education matters.
- 3.4 Horsham District Council agrees to keep WSCC informed of any changes to the phasing and/or amount of growth to be delivered in Horsham District over the period of its Local Plan to enable

West Sussex County Council to properly plan for and prioritise the provision of supporting infrastructure.

4. Key strategic cross-boundary matters

4.1 WSCC has responsibility for the following strategic functions which are particularly relevant to the development of the Horsham District Local Plan. The parties agree that WSCC will continue to provide timely technical and policy input on these matters as the HDLP progresses through its further stages, and that HDC will promptly respond to issues raised:

- In its role as the local highways authority, providing advice and ensuring the delivery of highways improvements to support development sites.
- Ensuring that there are sufficient school, SEND and early years places to support growth in Horsham District.
- Ensuring the need for future waste infrastructure for the handling and transfer of waste to manage waste in accordance with the waste hierarchy.
- In its role as Minerals and Waste Planning Authority, providing advice regarding the safeguarding of important minerals resources infrastructure and the provision and safeguarding of waste infrastructure, particularly with regard to the location of new development.

5. Housing need

5.1 The spatial strategy for the District to 2040 focuses on the positive management of change, in accordance with the principles of the National Planning Policy Framework. The Council has tested the strategy through the sustainability appraisal process, assessing a range of options for delivering growth and change and taking account of the requirement for water neutrality.

5.2 The District has relatively few designations that would ordinarily constrain development, although legal requirements placed on the Council through the Habitats Regulations 2017 and during the preparation of the Local Plan has moved the District from being a less constrained to a highly constrained area until such a time that the Arun Valley habitats issue can be overcome.

5.3 The Councils recognise that it is imperative that development needs are provided for, as far as possible and the Local Plan make provision for the development of at least 13,212 homes and associated infrastructure within the Plan period 2023-2040. This will come forward on a stepped trajectory basis, with a target of 480 per annum for the first 5 years, and a target of 901 per annum for the remaining 12 years.

5.4 The Regulation 19 draft Local Plan sets out that this is an appropriate and achievable figure. The parties agree that the Local Plan sets an appropriate strategy for the area and agree that the prospects for full mitigation of the impacts in relation to infrastructure overseen by WSCC being delivered is very positive.

6. Education provision

6.1 Horsham District Council has worked closely with WSCC as the Local Education Authority throughout the different stages of the plan-making process. Horsham District Council has shared details of the potential scenarios for growth in the earlier stages of plan preparation and following

the publication of the Regulation 18 Consultation, details of an emerging strategy. West Sussex County Council has provided comment and advice on the alternative growth strategies and potential strategic and settlement site allocations throughout the plan-making process.

- 6.2 The co-operation between the two councils has contributed to the identification of where new or additional school facilities will be required. The identified need has been set out in the Infrastructure Delivery Plan. The requirements for new school places, provision of new facilities, and SEND and Early Years provision has been set out in the Local Plan policy requirements.
- 6.3 At Regulation 19, WSCC submitted a number of comments relating to education provision. The significant increase in demand for funded Early Years places from April 2024 as a result of recent changes to local authority statutory duties was raised and amendments to the wording of the Infrastructure Delivery Plan to reflect this were recommended and agreed by both parties.
- 6.4 Changes to the wording of strategic site allocation policies outlining education requirements were sought to ensure these are effective in delivering the necessary education infrastructure. HDC has included suggested main modifications to reflect these. The parties agree that these may be considered by the Inspector in light of the evidence presented.
- 6.5 HDC and WSCC will continue co-operation throughout the Local Plan review process through to the planning application phase for plan-led development and physical build out.
- 6.6 As a result of the discussions described above the following matters have been agreed between Horsham District Council and West Sussex County Council:
- Subject to main modifications being made to facilitate further future expansion of school sites on two strategic sites, the Local Plan policies provide an adequate framework to support the delivery of new school places including SEND, and Early Years provision to mitigate the impact of development arising as a result of the Local Plan. However the Infrastructure Delivery Plan will need to be flexible and will be updated as a result of changes to the local authority statutory duties around early years and childcare, for which demand is expected to increase as Government schemes increase accessibility.
 - The Infrastructure Delivery Plan identifies the following education provision required to deliver the Local Plan growth, and in particular the allocated strategic sites including, but not limited to:
 - New secondary schools at West of Ifield and Southwater strategic sites and new primary schools at West of Ifield, West of Southwater and East of Billingshurst strategic sites. All new schools to be delivered with special support centres to supply specialist education for SEND pupils.
 - Proposed development will require expansion of school sites including the primary school to be delivered at North of Horsham and at Ashington where land will also be required outside of the existing school boundary.

- Education contributions towards existing schools and sixth form provision from other sites will be required to mitigate the impact of development.
- New nurseries will be required at West of Ifield, West of Southwater, East of Billingshurst and North Horsham strategic sites plus contributions to the provision of Early Years places.
- Main modifications will be put forward to the Local Plan Inspector to the Local Plan policies HA2: Land West of Ifield and HA3: Land North-West of Southwater, such that:
 - The requirement at Land West of Ifield is for one 2-form entry primary school and one 2-form entry expandable to 3-form entry primary school, and an 8-form entry expandable to 10-form entry secondary school.
 - The requirement for Land North-West of Southwater is for a 6-form entry secondary school expandable to 8-form entry secondary school (with no change to the policy for primary school provision).
- The Authorities have agreed to continue to work closely together with partners on the delivery of education provision and related matters to support the implementation of the Local Plan policies and the delivery of the strategic and settlement site allocations.

7. Transport Mitigation

- 7.1 In preparation of the transport evidence base for the Local Plan both HDC and WSCC have worked closely with National Highways in relation to the strategic road network. There has also been detailed work in relation to the assessment of the impacts of the growth associated with the Local Plan on the local highway network and testing of a number of mitigations to address impacts, including measures to reduce travel and increase sustainable and active travel in line with national policy requirements.
- 7.2 Horsham District Council commissioned Stantec to undertake a Transport Study to inform the emerging Horsham District Local Plan. The purpose of the Study was to build a strategic highway model to underpin the assessment of the Local Plan impacts, and then to audit safety for road users in light of growth and changes to the network. The Study has tested the potential growth scenarios on the strategic and local highway network for the Plan period.
- 7.3 The following transport and highways related matters have been the subject of detailed discussions and extensive dialogue between WSCC and HDC:
- Assessment of the impacts local plan strategy scenarios might have on the local and strategic highways networks.
 - Comparison of different development scenarios and their relative impacts on the network.
 - Strategies that are likely to be effective in increasing internalisation of trips on strategic development sites, and modelling of the impacts.
 - Strategies and measures to improve the attractiveness of bus and train travel, cycling and walking, and modelling of the impacts.

- Appropriate physical highway improvements that might address the residual issues of congestion, safety and modelling of the impacts, and
- Site-specific transport strategies for strategic sites, as part of discussions with the relevant site promoters.

7.4 Following the Regulation 19 publication, West Sussex County Council submitted a holding objection while the Transport Study forming part of the Local Plan evidence base was concluded. This work has now completed, and it is agreed by the parties that it provides sufficient basis for the HDLP to progress.

7.5 WSCC has asked to be assured through the Infrastructure Delivery Plan that full costs of necessary transport improvements are known, and will be adequately provided for alongside other infrastructure within the Plan period with appropriate timescales for delivery. HDC agrees with the principle of developer funding/CIL addressing funding gaps in strategic transport improvements. HDC further agrees that the appropriate means of determining these costings are through the Infrastructure Delivery Plan which relies on input from WSCC, and will continue to work with WSCC to ensure this document remains up-to-date.

7.6 At Regulation 19, WSCC made a number of representations which proposed wording amendments to the policies and supporting text to elements of the Local Plan. A number of these changes were suggested by WSCC as it is their view that these amendments are required to ensure that the Horsham District Local Plan is sound. Prior to submission of the local plan, HDC reviewed these proposed amendments, and in response has suggested a number of proposed wording changes to the plan, to help address the points raised by WSCC. These are contained in a schedule of proposed modifications. It is not however HDC's position that these modifications are substantial or go to the heart of soundness of the Plan. Nor does HDC agree that all the wording changes proposed by WSCC to be necessary or appropriate. Whilst there is a different of opinion on these matters, both HDC and WSCC agree that they will continue to work together during the examination process to resolve soundness issues identified by the Local Plan inspector in relation to these points.

8. Flood risk management

- 8.1 During the preparation of the Local Plan the Council has worked with a number of organisations, including West Sussex County Council.
- 8.2 To support the policies associated with flooding in the Local Plan and to identify potential site specific flood issues associated with proposed allocations, Horsham District Council commissioned AECOM Ltd to undertake a Level 1 Strategic Flood Risk Assessment (SFRA) of the Arun and Adur river catchment areas in January 2020. The SFRA is being updated to ensure that a sequential test is applied to proposed site allocations in relation to all sources of flood risk and the current and future impacts of climate change.
- 8.3 Also, Horsham District Council along with other neighbouring planning authorities (Crawley Borough Council, Mid Sussex District Council and Reigate and Banstead District Council) commissioned Jeremy Benn Associates Ltd (JBA) to undertake the Gatwick Sub-Region Water Cycle Study in August 2020.

- 8.4 Furthermore, JBA were also commissioned by Crawley Borough Council, Horsham District Council and Chichester District Council to undertake a Water Neutrality Study in April 2021. This was in response to Natural England's significant concern regarding increased water abstraction at Hardham having an adverse impact on associated designated habitats in the Arun Valley.
- 8.5 These studies were used to assess site allocations in the Local Plan in order to identify options with the lowest risk of flooding while still meeting the District's housing need. The studies also provide a series of flood risk management policy recommendations to manage future flood risk at sites that are at risk from all forms of flooding. These recommendations, where appropriate and necessary, have been included as supporting text and policy criteria in the Local Plan site allocation policies.
- 8.6 West Sussex County Council (WSSC) is the Lead Local Flood Authority with responsibility for flood risk from surface water, groundwater and ordinary watercourses (streams, small rivers and ditches). Both West Sussex County Council and Horsham District Council are members of the West Sussex Strategic Flood Risk Management Group (WSSFRMG) which is a technical group providing proactive flood risk management. The WSSFRMG meets three times a year and includes other district and borough councils, the Environment Agency and Southern Water. As the Lead Local Flood Authority, WSSC has been consulted on the Plan, the Infrastructure Delivery Plan and the preparation of the SFRA.

9. Library requirements

- 9.1 There are currently seven libraries within Horsham District and library facilities are planned as part of the Local Centre of the strategic allocation at North of Horsham. West Sussex County Council is responsible for delivering the library service which is a statutory service and is provided free of charge to those who live, work or study in the County. WSSC collects contributions from new development towards new libraries, the expansion of existing facilities or the delivery of Tier 7 facilities in large-scale development where facilities are delivered within community spaces.
- 9.2 As a result of the discussions between WSSC and HDC the following matters have been agreed:
- A library offer is required at West of Ifield, given the scale of the proposed site allocation.
 - The remaining site allocations will all generate contributions towards the existing libraries within the District.

10. Fire and Rescue Service requirements

- 10.1 Full Council is the West Sussex Fire Authority is responsible for making sure that the West Sussex Fire & Rescue Service (WSFRS) performs efficiently and in the best interest of the public and community it serves. Although WSFRS has strategically placed fire stations, the crewing and firefighting capacity at each station can vary. As such, WSFRS resources work flexibly and regularly attend incidents some distance away from their assigned station in order to suitably resource each emergency incident. Therefore, the effect of any development in the County must be examined holistically.
- 10.2 As a result of discussions between WSSC and HDC the following matters have been agreed:

- The proposed site allocations will generate additional requirements to support fire services at Crawley, Horsham, Billingshurst, Storrington, Partridge Green, Steyning and Henfield Fire Stations.

11. Other Matters

11.1 Horsham District Council and West Sussex County Council work together through a number of other groups that have been established to address specific shared issues including participation in the Gatwick Joint Local Authorities and matters relating to the Arun Valley Line. The Duty to Co-operate Statement also provides further details on other key actions between the two parties.

11.2 Public Health and Wellbeing. West Sussex County Council (WSSC) has public health responsibilities for the Horsham population. Horsham District Council have engaged with WSSC on health and wellbeing matters during the development of the Local Plan and through the IDP process specifically. Engagement has taken place through Health, Wellbeing and Sustainability workshops run by the Public Health and Sustainability (PHS) team, and WSSC have provided information and support to HDC on where to find public health intelligence data which highlights local health and wellbeing outcomes and key issues in the Horsham District. HDC officers have also met with WSSC's PHS Programme Manager in order to discuss the Local Plan's role in addressing health and wellbeing needs. This engagement has been used to guide and inform policies in the emerging Local Plan. In addition, HDC officers have contributed to a Creating Health and Sustainable Places framework document created by WSSC, intended to provide evidence and signpost guidance and tools which can be used to inform, development which supports health, wellbeing and sustainability outcomes. Both parties agree that the policy wording has been strengthened to reflect the importance of the issue.

11.3 There is an assessed need for 128 Gypsy and Traveller pitches to be provided in the District in addition to those already existing. In part due to the recently updated definition of Gypsy or Traveller in the Planning Policy for Traveller Sites (PPTS), the District will have a shortfall of 58 Gypsy and Traveller pitches (it has no assessed need for Travelling Showpeople provision). This has been considered by WSSC and no particular issues are identified.

11.4 The identified need for additional employment land within Horsham District will be provided for within the adopted and emerging local plans. Horsham District Council seeks to allocate land for employment growth beyond its objectively assessed needs in order to reduce the currently high level of net out-commuting, provide a good choice of local jobs and ensure flexibility of employment land supply. This has been considered by WSSC and no particular issues are identified.

12. Closing matters and further work

12.1 The parties to this statement have demonstrated that they have worked jointly and constructively on relevant cross-boundary matters relevant to the plan-making process. The parties confirm that they will continue to do so, as outlined above and through sustained joint dialogue and the commissioning of joint studies as appropriate.